

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

ERIC SHAMBROOM,)	Case No. 4:20-CV-3104
)	
Plaintiff,)	
v.)	
SANDHILLS GLOBAL, INC.,)	UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT
Defendant.)	
)	

Defendant Sandhills Global, Inc. respectfully moves the Court pursuant to Fed. R. Civ. P. 6(b)(1)(A) and NECivR 7.1(a)(1)(B) for an extension of time to answer or otherwise respond to the Complaint (ECF #1). In support of this motion, Defendant states:

1. No proof of service has been filed, but Defendant calculates the earliest the deadline for serving an answer or otherwise responding to the Complaint is September 23, 2020.
2. This is Defendant Sandhills Global, Inc.'s first request for an extension.
3. An extension of time is requested due to the need to fully investigate Plaintiff's allegations, particularly as it appears the website in dispute is not operated by Defendant Sandhills Global, Inc., but rather by a subsidiary company in Manchester, England. Notably, the website at issue is written entirely in German, not English, and is not directed to any U.S. jurisdiction. Further complicating the investigation is the need for translators because it appears people in Germany and Italy may have knowledge of the website work in dispute for the London company. Therefore, Defendant needs additional time to investigate its response to the Complaint on these issues.
4. Counsel for Defendant has conferred with counsel for Plaintiff, and Plaintiff has no objection to this extension.

WHEREFORE, Defendant respectfully requests an order granting an extension of time

until and including October 23, 2020, in which to answer or otherwise respond to the Complaint.

Dated this 22nd day of September, 2020.

SANDHILLS GLOBAL, INC., Defendant,

By: *Is/ Daniel J. Fischer*

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 22, 2020, I electronically filed the foregoing with the Clerk of the Court using the court's electronic filing system, which will send electronic notification of such filing to all registered participants:

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